UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

June 26, 1991

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: Automatic in-Tank Monitors

FROM: Dave O'Brien, Chief /s/
Technical Standards Branch
Office of Underground Storage Tanks

To: Leslie Zawacki, Acting
Region 8 UST Program Manager

I am providing the following interpretation in response to Region 8's question as to whether an in-tank monitor in the test mode may be considered a precision test and, if yes, would this test suffice for the requirement of performing a precision test at new tank installation?

Our regulations, at 280.20(d), require that "all tanks and piping must be properly installed in accordance with a code of practice developed by a nationally recognized association..." The regulations go on to list API Publication 1615 as an acceptable code of practice. API Recommended Practice 1615 (section 10.6 Final Testing), states "Conduct precision test (see 1.3.23) of all tanks and piping after all paving over the tanks and piping has been completed and before the system is placed in operation." Section 1.3.23 defines a precision test as "a test of the liquid-product-handling portion of an underground storage tank system, or a portion of the system that meets the criteria of NFPA 329." NFPA 329 states that the test should be capable of detecting a loss of .05 gallons/hour.

The regulations also require that t tightness test, which is analogous to the precision test in NFPA 329, incorporate all portions of the UST system that routinely contain product. Thus the automatic in-tank monitor must test all portions of the UST system that are not protected by the overfill protection device, i.e., the UST must be filled with liquid to the level immediately below which the overfill device would be triggered.